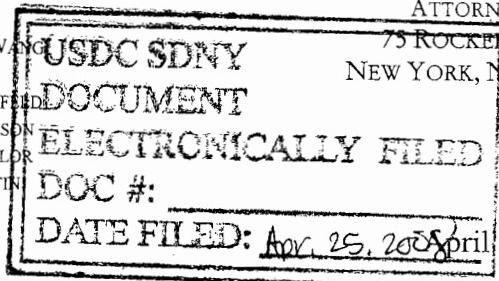


RICHARD D. EMERY  
ANDREW G. CELLI, JR.  
MATTHEW D. BRINCKERHOFF  
JONATHAN S. ABADY  
ILANN M. MAAZEL  
ERIC HECKER  
MARIANNE MEIER WANG  
SARAH NETBURN  
KATHERINE ROSENFIELD  
O. ANDREW F. WILSON  
ELIZABETH S. SAYLOR  
KENNISHA A. AUSTIN

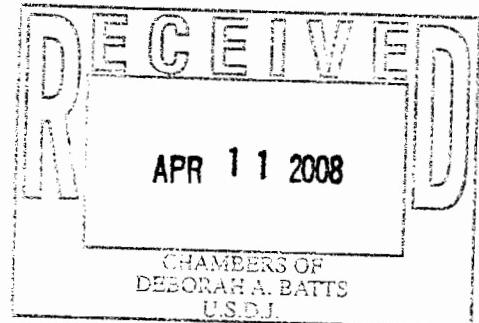
## EMERY CELLI BRINCKERHOFF &amp; ABADY LLP

ATTORNEYS AT LAW  
75 ROCKEFELLER PLAZA  
NEW YORK, NEW YORK 10019

TELEPHONE  
(212) 763-5000  
TELECOPIER  
(212) 763-5001  
WEB ADDRESS  
www.ecbalaw.com



0, 2008

*By Hand*

Hon. Deborah A. Batts  
United States District Judge  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street, Room 2510  
New York, New York 10007-1312

*Re:* Robert Kalfus v. The New York and Presbyterian Hospital et al.,  
07 Civ. 11455 (DAB) (DFE)

Your Honor:

Our firm represents plaintiff Robert Kalfus in the above-captioned action and we write pursuant to Fed. R. Civ. P. 26(f), on behalf of all parties regarding our recent discovery conference in anticipation of the initial pretrial conference scheduled April 25, 2008.

Mr. Kalfus, a professional news photographer for over three decades, brings this civil rights action based on his allegations that Defendants unlawfully arrested, charged and injured him on the afternoon of May 14, 2007, while he was waiting in front of The New York and Presbyterian Hospital, because Mr. Kalfus was a member of the media.

The parties have now met and conferred and agreed to the following proposed dates for discovery:

<u>Event</u>	<u>Date</u>	<u>/DAB/ GRANTED April 25, 2008</u>
Exchange of 26(a)(1) Disclosures	April 25	
Close of Fact Discovery	September 30	
Exchange of Expert Reports	October 15	
Exchange of Rebuttal Reports	November 17	
Close of Expert Discovery	December 5	

The parties respectfully request that discovery disputes be submitted to Magistrate Judge Eaton who has been assigned to this matter. At this time, the parties do not anticipate any particular

**SO ORDERED**  
*Deborah A. Batts*

DEBORAH A. BATTIS  
UNITED STATES DISTRICT JUDGE

EMERY CELLI BRINCKERHOFF & ABADY LLP

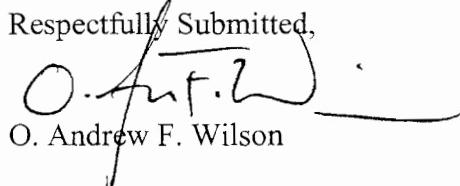
Hon. Deborah A. Batts

April 10, 2008

Page 2 of 2

issues with regard to privilege. The parties agree to the limitations of discovery provided for by the Federal Rules.

Respectfully Submitted,

  
O. Andrew F. Wilson

c: Asfaan Saleem, Esq. (*by fax*)  
Kenneth J. Kelly, Esq. (*by fax*)